

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

UNITED STATES, *et al.*,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

No. 1:23-cv-00108-LMB-JFA

**NON-PARTY THE WALT DISNEY COMPANY'S MOTION TO SEAL**

Pursuant to Local Civil Rule 5(C), non-party The Walt Disney Company (“TWDC”) respectfully moves this Court to seal portions of the deposition testimony of Jeremy Helfand. As discussed further in the accompanying memorandum of law, sealing the identified portions of this deposition testimony is necessary and tailored to protect TWDC’s sensitive, confidential, business information.

July 31, 2024

Respectfully submitted,

COVINGTON & BURLING LLP

/s/ Connor Kelley  
Connor Kelley (VA Bar No. 93596)  
One CityCenter  
850 Tenth St., NW  
Washington, DC 20001  
Telephone: 202-662-6000  
Facsimile: 202-778-5628  
ckelley@cov.com

E. Kate Patchen (admitted *pro hac vice*)  
Salesforce Tower

415 Mission Street, Suite 5400  
San Francisco, CA 94105  
Telephone: 415-591-6000  
kpatchen@cov.com

*Attorneys for Non-Party The Walt Disney  
Company*